

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**v.**

**JULIO LEIJA-SANCHEZ**, a/k/a “Rogelio Garcia-Salazar;” “Adrian Perez-Benitez;” “Cesar Juarez;” “Savino Zapiel;” “Rogelio Garcia;” “Carlos Becerra Velasquez;” “Larry;” “Salivas;”  
**MIGUEL CEPEDA**, a/k/a “Muta;” “Cesar Ortiz;” “El Monstro;”  
**JOSE CORTEZ-PEREZ**, a/k/a “Bigotes;” “Bigos;” “Aramon Montero-Cortel;” “Roberto Castro;” “Ramon Gomez;” “Alberto Gomez-Ramirez;” “Spider;” “Tarantula;”  
**ARMANDO DAVILA**, a/k/a “Bikini;” “Tanque;”  
**ANGEL MARTIN DORANTES-VASQUEZ**, a/k/a “Angel Dorantes;” “Martin;” “Botas;” “Vaquero;”  
**RAUL GONZALEZ-MARQUEZ**, a/k/a “Raul Marquez-Gonzalez;” “Raul Marquez;” “Raul Gonzalez;” “Rauline;” “Raulin;” “Rulas;”  
**RICARDO GONZALEZ-MARQUEZ**, a/k/a “Rico;” “Ricos;” “Chino;”  
**JULIO CESAR HERNANDEZ-LOPEZ**, a/k/a “Pabo;” “Pablo Hernandez;” “Pavo;”  
**MANUEL LEIJA-SANCHEZ**, a/k/a “Reglas;” “Manuel Sanchez-Leija;” “Vincente;” “Aguilar;” “Ricardo Leiba;” “Marcos Zamora;” “Miguelito;” “Moco;” “Enrique Felix;”  
**ANTONIO MARQUEZ**, a/k/a “Topo;” “Tomatillo;” “Topoillo;”  
**ELIAS MARQUEZ**, a/k/a “Tio;” “Don;”  
**EDUARDO MOLINA-VASQUEZ**, a/k/a “Caracol;” “Arturo Vasquez-Laguna;” “David Ramirez-Montez;” “Edwardo Molina;” “Arturo Salizar;” “Rott;”

)  
) Judge Rebecca R. Pallmeyer  
)  
) No. 07 CR 224  
)  
) Violations:  
) Title 8, United States Code, Sections  
) 1324(a)(1)(A)(v)(I),  
) 1324(a)(1)(B)(i), and 1326(a);  
)  
) Title 18, United States Code,  
) Sections 2, 371, 956(a)(1),  
) 1956(a)(2)(B)(i), 1958, 1959(a)(1),  
) 1959(a)(5), and 1962(d);  
)  
) Title 31, United States Code,  
) Section 5332

**SUPERSEDING INDICTMENT**

<b>OSCAR MONTIEL-GERRIDO</b> , a/k/a	)
"Rambo;" "Rambito;"	)
<b>RAFAEL MORALES</b> , a/k/a "Mollejas;"	)
<b>ALFREDO MUNIZ</b> , a/k/a "Chuy;" "Lobos;"	)
"Chucas;"	)
<b>LUIS PEREZ</b> , a/k/a "Ronas;"	)
<b>OSCAR PERIGRINO</b> , a/k/a "Primate;"	)
"Juan Carlos Sandoval-Hernandez;"	)
<b>RICARDO QUINTERO-LOPEZ</b> , a/k/a	)
"Porki;" "El Chato;" "Chicharon;"	)
"Ramon Cisneros;" "Cochino;"	)
<b>GERARDO SALAZAR-RODRIGUEZ</b> ,	)
a/k/a "Larossa;" "Chapulín;" "Labrosa;"	)
<b>CATERINA ZAPIEN-RUIZ</b> , a/k/a	)
"Cathy;"	)
<b>CLAUDIO CARRILLO-FUENTES</b> , a/k/a	)
"Chispa;" "Dingo;" and	)
<b>ELIAS MUNOZ</b> ;	)
<b>PEDRO LEIJA-SANCHEZ</b> ,	)
a/k/a "Baroco;" "Roberto Perez-Vasquez;"	)
"Arturo Arias;" "Fernando Alcantaro;"	)
"Jose Perez;" and "Arnulfo Almenta"	)

## **FIRST SUPERSEDING INDICTMENT**

### **COUNT ONE**

The SPECIAL AUGUST 2006-1 GRAND JURY alleges:

1. Beginning in or about at least 1993, and continuing to on or about April 24, 2007,  
at Chicago, in the Northern District of Illinois and elsewhere,

**JULIO LEIJA-SANCHEZ,  
MIGUEL CEPEDA,  
JOSE CORTEZ-PEREZ,  
ARMANDO DAVILA,  
ANGEL MARTIN DORANTES-VASQUEZ,  
RAUL GONZALEZ-MARQUEZ,  
RICARDO GONZALEZ-MARQUEZ,  
JULIO CESAR HERNANDEZ-LOPEZ,  
MANUEL LEIJA-SANCHEZ,  
ANTONIO MARQUEZ,**

**ELIAS MARQUEZ,  
EDUARDO MOLINA-VASQUEZ,  
OSCAR MONTIEL-GERRIDO,  
RAFAEL MORALES,  
ALFREDO MUNIZ,  
LUIS PEREZ,  
OSCAR PERIGRINO,  
RICARDO QUINTERO-LOPEZ,  
GERARDO SALAZAR-RODRIGUEZ,  
CATERINA ZAPIEN-RUIZ,  
CLAUDIO CARRILLO-FUENTES,  
ELIAS MUNOZ, and  
PEDRO LEIJA-SANCHEZ**

defendants herein, knowingly and intentionally conspired with each other, and with others, including Individual A, known and unknown to the grand jury, to: (a) unlawfully produce identification documents, authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(1); and (b) forge, counterfeit, alter, and falsely make any immigrant and nonimmigrant visa, permit, and other document prescribed by statute and regulation for entry into and as evidence of authorized stay or employment in the United States, in violation of Title 18, United States Code, Section 1546(a);

2. It was a part of the conspiracy that JULIO LEIJA-SANCHEZ and, at times, MANUEL LEIJA-SANCHEZ and PEDRO LEIJA-SANCHEZ, together with others ( hereinafter the “LEIJA-SANCHEZ ORGANIZATION”), caused the unlawful production of identification documents, authentication features, and false identification documents (such as driver’s licenses, immigration documents, and other purportedly government-issued documents) for sale to customers in the Little Village area of Chicago.

3. It was further a part of the conspiracy that some members of the LEIJA-SANCHEZ ORGANIZATION, including MIGUEL CEPEDA, JOSE CORTEZ-PEREZ, ARMANDO DAVILA, RICARDO GONZALEZ-MARQUEZ, JULIO CESAR HERNANDEZ-LOPEZ, ANTONIO

MARQUEZ, EDUARDO MOLINA-VASQUEZ, OSCAR MONTIEL-GERRIDO, RAFAEL MORALES, ALFREDO MUNIZ, LUIS PEREZ, OSCAR PERIGRINO, CLAUDIO CARRILLO-FUENTES and RICARDO QUINTERO-LOPEZ, solicited customers on street corners in the Little Village area of Chicago to purchase false identification documents in exchange for money. When customers were located, members of the LEIJA-SANCHEZ ORGANIZATION obtained a photograph – often from a photography shop in the Little Village area called Nuevo Foto Munoz owned and operated by co-defendant ELIAS MUNOZ – and personal information from the customer to place on the false identification document. ELIAS MUNOZ provided members of the LEIJA-SANCHEZ ORGANIZATION order forms, which he kept in a box on a desk in the entryway of Nuevo Foto Munoz. The order forms were in both English and Spanish, and asked for the name, address, date of birth, social security number, weight, height and color of eyes the customer wanted the LEIJA-SANCHEZ ORGANIZATION to print on the fraudulent identification document.

4. It was further a part of the conspiracy that other members of the LEIJA-SANCHEZ ORGANIZATION, including EDUARDO MOLINA-VASQUEZ, ALFREDO MUNIZ, OSCAR PERIGRINO, and RICARDO QUINTERO-LOPEZ, caused the photographs and personal information from customers to be sent to a document production facility where the false identification documents were made.

5. It was further part of the conspiracy that the false identification documents were manufactured at various locations, including an apartment located at 2555 South Lombard Avenue, Cicero, Illinois, and an apartment located at 5366 South Campbell Avenue, basement unit, Chicago, Illinois, by other members of the LEIJA-SANCHEZ ORGANIZATION, including ELIAS MARQUEZ and Individual A.

6. It was further a part of the conspiracy that members of the LEIJA-SANCHEZ

ORGANIZATION, including ANGEL MARTIN DORANTES-VASQUEZ and JOSE CORTEZ-PEREZ, conducted counter-surveillance in the Little Village area to warn other members of the LEIJA-SANCHEZ ORGANIZATION of the presence of law enforcement in the area.

7. It was further a part of the conspiracy that members of the LEIJA-SANCHEZ ORGANIZATION, including RAUL GONZALEZ-MARQUEZ, collected cash proceeds from the sale of false documents and smuggled and attempted to smuggle some of the cash in bulk to locations in Mexico.

8. It was further a part of the conspiracy that members of the LEIJA-SANCHEZ ORGANIZATION, including JULIO LEIJA-SANCHEZ and CATERINA ZAPIEN-RUIZ, communicated with associates in Mexico in order to discuss the business of the LEIJA-SANCHEZ ORGANIZATION and to order supplies needed to manufacture false identification documents.

10. It was further a part of the conspiracy that members of the LEIJA-SANCHEZ ORGANIZATION caused illegal aliens, including Individual A, to be smuggled into the United States from Mexico in order to work for the LEIJA-SANCHEZ ORGANIZATION.

### **Overt Acts**

11. In furtherance of the conspiracy and to effect the objects and purposes thereof, defendants committed and caused to be committed the following overt acts, among others, within the Northern District of Illinois and elsewhere:

a. On or about October 4, 2006, RICARDO QUINTERO-LOPEZ discussed with an individual ("CI") who, unbeknownst to him, was working with agents of Immigration and Customs Enforcement, the transfer of recently manufactured false identification documents from a document production facility to members of the LEIJA-SANCHEZ ORGANIZATION who were selling false documents to customers.

b. On or about October 7, 2006, ANTONIO MARQUEZ discussed with the CI that MARQUEZ had supplied a customer with false identification documents.

c. On or about December 19, 2006, ELIAS MARQUEZ discussed with the CI mistakes that were made when making certain false identification documents.

d. On or about December 19, 2006, OSCAR PERIGRINO agreed to transport information needed to make false identification documents from street vendors to a document production facility.

e. On or about January 15, 2007, ALFREDO MUNIZ took an order from the CI to make a false identification document.

f. On or about January 20, 2007, JOSE CORTEZ-PEREZ made plans to meet with the CI to provide the CI with false identification documents which had been manufactured by the LEIJA-SANCHEZ ORGANIZATION.

g. On or about January 23, 2007, EDUARDO MOLINA-VASQUEZ took an order from the CI to make a false identification document.

h. On or about February 2, 2007, ARMANDO DAVILA and ELIAS MARQUEZ discussed a mistake that had been made by the LEIJA-SANCHEZ ORGANIZATION in the creation of a false identification document.

i. On or about February 7, 2007, JULIO LEIJA-SANCHEZ, ANGEL MARTIN DORANTES-VASQUEZ, ELIAS MARQUEZ, and CLAUDIO CARRILLO-FUENTES participated in the production of a false identification document, namely a fraudulent driver's license, for DORANTES-VASQUEZ.

j. On or about February 9, 2007, MIGUEL CEPEDA and ELIAS MARQUEZ discussed obtaining payment for a false identification document which had been created by the

LEIJA-SANCHEZ ORGANIZATION.

k. On or about February 22, 2007, RICARDO GONZALEZ-MARQUEZ and ELIAS MARQUEZ discussed the production by MARQUEZ of false identification documents for a customer of GONZALEZ-MARQUEZ.

l. On or about February 25, 2007, RAUL GONZALEZ-MARQUEZ traveled on behalf of the LEIJA-SANCHEZ ORGANIZATION to Galveston, Texas by car attempting to smuggle over \$150,000 in proceeds of the LEIJA-SANCHEZ ORGANIZATION into Mexico.

m. On or about February 26, 2007, RAUL GONZALEZ-MARQUEZ, JULIO LEIJA-SANCHEZ, and MANUEL LEIJA-SANCHEZ had discussions concerning GONZALEZ-MARQUEZ's apprehension by law enforcement in Galveston, Texas while attempting to smuggle funds to Mexico on behalf of the LEIJA-SANCHEZ ORGANIZATION.

n. On March 31, 2007, GERARDO SALAZAR-RODRIGUEZ and JULIO LEIJA-SANCHEZ discussed plans to murder an individual in Mexico named "Montes."

o. On April 3, 2007, GERARDO SALAZAR-RODRIGUEZ and JULIO LEIJA-SANCHEZ discussed plans to murder an individual in Mexico named "Bruno."

p. On or about April 3, 2007, EDUARDO MOLINA-VASQUEZ and ELIAS MUNOZ participated in the sale of two false identification documents, namely, a fraudulent Michigan driver's license and a fraudulent Wisconsin driver's license, to undercover police officers. MOLINA-VASQUEZ introduced the officers to MUNOZ, who took the photographs which were used to make the fraudulent Michigan and Wisconsin driver's licenses.

q. On or about April 4, 2007, OSCAR MONTIEL-GERRIDO and ELIAS MUNOZ participated in the sale of two false identification documents, namely, a fraudulent New York driver's license and a fraudulent Iowa driver's license, to undercover police officers.

MONTIEL-GERRIDO walked the officers to Nuevo Foto Munoz, where MUNOZ took the photographs which were used to make the fraudulent New York and Iowa driver's licenses.

r. On or about April 5, 2007, LUIS PEREZ, EDUARDO MOLINA-VASQUEZ, and ELIAS MARQUEZ participated in the sale of false identification documents, namely social security cards and green cards for two undercover police officers.

s. On April 16, 2007, JULIO CESAR HERNANDEZ-LOPEZ and ELIAS MARQUEZ had a discussion concerning the status of a fraudulent Wisconsin license that HERNANDEZ-LOPEZ had ordered for a customer.

t. On April 17, 2007, CATERINA ZAPIEN-RUIZ had a discussion with another individual concerning supplies and equipment that had been ordered by the LEIJA-SANCHEZ ORGANIZATION from sources in Mexico;

All in violation of Title 18, United States Code, Section 371.



## **COUNT TWO**

The SPECIAL AUGUST 2006-1 GRAND JURY further alleges:

### **RACKETEERING ENTERPRISE**

1. A criminal organization (hereinafter the “LEIJA-SANCHEZ ORGANIZATION”), existed that promoted and carried on illegal activities in the United States, including in the city of Chicago, Illinois, in the Northern District of Illinois, Eastern Division, and consisted of the defendants named in Count One of this superseding indictment, and others known and unknown to the Grand Jury.

2. The LEIJA-SANCHEZ ORGANIZATION, including its leaders, members, and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose leaders, members, and associates functioned as a continuing unit for a common purpose of achieving the objectives of the LEIJA-SANCHEZ ORGANIZATION.

3. The LEIJA-SANCHEZ ORGANIZATION was engaged in, and its activities affected, interstate and foreign commerce.

### **PURPOSES OF THE ENTERPRISE**

4. The purposes of the LEIJA-SANCHEZ ORGANIZATION included, but were not limited to, the following:

a. The LEIJA-SANCHEZ ORGANIZATION was a criminal fraudulent document vending organization operating in the “Little Village” area of Chicago, along 26th Street between Albany and St. Louis. The LEIJA-SANCHEZ ORGANIZATION produced and sold fraudulent identification documents, including Resident Alien Cards (Green Cards), Social Security Cards, Driver’s Licenses, and State Identification Cards. The LEIJA-SANCHEZ ORGANIZATION

sold as many as 50-100 sets of fraudulent identification documents each day, charging customers approximately \$200 to \$300 cash per set. The LEIJA-SANCHEZ ORGANIZATION generated revenues of at least approximately \$2,500,000 to \$3,000,000 cash per year.

b. The LEIJA-SANCHEZ ORGANIZATION enriched its leaders, members, and associates through various forms of illegal activity including, but not limited to, unlawful production of identification documents and visas, money laundering, and alien smuggling.

c. The LEIJA-SANCHEZ ORGANIZATION preserved and protected its power, territory, operations, and profits through the use of threats, intimidation, and violence, including, but not limited to, murder, solicitation of murder, and attempted murder.

d. The LEIJA-SANCHEZ ORGANIZATION undertook steps necessary to prevent the detection of its criminal activities, and sought to prevent and resolve the imposition of any criminal liabilities upon the LEIJA-SANCHEZ ORGANIZATION and its leaders, members, and associates, including by the use of murder and violence.

### **STRUCTURE OF THE ENTERPRISE**

5. The structure of the LEIJA-SANCHEZ ORGANIZATION included, but was not limited to the following:

a. The LEIJA-SANCHEZ ORGANIZATION originated in and operated from Mexico. Members of the LEIJA-SANCHEZ ORGANIZATION in Mexico participated by, among other things, supplying and smuggling blank documents and document-making equipment into the United States, by recruiting and smuggling illegal aliens into the United States to work for the LEIJA-SANCHEZ ORGANIZATION, and by collecting, managing, and investing cash proceeds generated by the LEIJA-SANCHEZ ORGANIZATION. The LEIJA-SANCHEZ ORGANIZATION was operated and supervised by an overall leader living in Chicago. Since approximately the early

1990s, the principal responsibility for leadership of the LEIJA-SANCHEZ ORGANIZATION rotated among three brothers: JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, and PEDRO LEIJA-SANCHEZ. JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, and PEDRO LEIJA-SANCHEZ made the day-to-day decisions for the LEIJA-SANCHEZ ORGANIZATION and, along with others, ordered violent acts against competitors, rivals, and others.

b. The LEIJA-SANCHEZ ORGANIZATION produced fraudulent identification documents, including Resident Alien Cards (Green Cards), Social Security Cards, Driver's Licenses, and State Identification Cards, and sold these documents to customers in the Little Village area of Chicago. A customer purchased a document by providing the LEIJA-SANCHEZ ORGANIZATION cash payment as well as the photograph and personal information that the customer wanted to appear on the document. Members of the LEIJA-SANCHEZ ORGANIZATION caused the photographs and personal information from customers to be sent to a document production facility where the false identification documents were made. Members of the LEIJA-SANCHEZ ORGANIZATION manufactured the false identification documents at various locations, including an apartment located at 5366 South Campbell Avenue, basement unit, Chicago, Illinois.

c. A "vendor," "micero," "miquero," "solicitor," or "seller" was a person standing on the street using hand gestures and verbally announcing to pedestrians and vehicles that he had identification documents for sale. A vendor advised customers of the cost of the identity documents and the location of the photography shop – usually Nuevo Foto Munoz – where the customer was advised to obtain photographs for the identification documents. A vendor took the order, photographs, and payment from the customer.

d. A "runner" was a person who transported the money and the customer's

information to the manufacturer. Some runners transported the order, photographs, and payment from the vendor to the manufacturer. Some runners collected the customer's payments from the vendors. Some runners transported the completed identification documents from the manufacturer back to the Discount Mall.

e. A "lookout" was a person whose duties were to notify other members of the LEIJA-SANCHEZ ORGANIZATION when law enforcement was in the area.

f. A "manufacturer" was a person who created the fraudulent identification documents out of a residence referred to as an "office," using equipment such as typewriters, laminators, paper cutters, computers, and printers to produce false identification documents. There were two to six manufacturers working in an office at any one time.

g. A "cash smuggler" was a person who transported to Mexico the illicit proceeds from the LEIJA-SANCHEZ ORGANIZATION's sale of fraudulent documents in Chicago.

h. An "office manager" was a person who supervised the manufacturers' production of fraudulent identification documents out of the "office."

i. An "enforcer" was a person who committed violent offenses, such as murder and attempted murder, in order to protect the enterprise and/or to intimidate and eliminate rivals.

### **ROLES IN THE ENTERPRISE**

6. At times material to this superseding indictment, the defendants performed multiple roles within the enterprise that included, but were not limited to, the following:

a. Defendant JULIO LEIJA-SANCHEZ was a member of the LEIJA-SANCHEZ ORGANIZATION and at times was responsible for overseeing the activities of the LEIJA-SANCHEZ ORGANIZATION. JULIO LEIJA-SANCHEZ directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs

of the LEIJA-SANCHEZ ORGANIZATION.

b. Defendant MANUEL LEIJA-SANCHEZ was a member of the LEIJA-SANCHEZ ORGANIZATION and at times was responsible for overseeing the activities of the LEIJA-SANCHEZ ORGANIZATION. MANUEL LEIJA-SANCHEZ directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LEIJA-SANCHEZ ORGANIZATION.

c. Defendant PEDRO LEIJA-SANCHEZ was a member of the LEIJA-SANCHEZ ORGANIZATION and at times was responsible for overseeing the activities of the LEIJA-SANCHEZ ORGANIZATION. PEDRO LEIJA-SANCHEZ directed other members of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the affairs of the LEIJA-SANCHEZ ORGANIZATION.

d. Defendant GERARDO SALAZAR-RODRIGUEZ was a member of the LEIJA-SANCHEZ ORGANIZATION, at times in the capacity of vendor and at times in the capacity of enforcer. Under the direction of the leaders of the LEIJA-SANCHEZ ORGANIZATION, GERARDO SALAZAR-RODRIGUEZ participated in unlawful and other activities in furtherance of the conduct of the affairs of the LEIJA-SANCHEZ ORGANIZATION.

### **RACKETEERING CONSPIRACY**

7. Beginning in or about at least 1993, and continuing to on or about April 24, 2007, at Chicago, in the Northern District of Illinois and elsewhere, defendants,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
GERARDO SALAZAR-RODRIGUEZ,**

and others known and unknown to the Grand Jury, being persons employed by and associated with

an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, that is, the LEIJA-SANCHEZ ORGANIZATION, did knowingly and unlawfully conspire with each other, in violation of Title 18, United States Code, Section 1962(c), to unlawfully conduct and participate, directly and indirectly, in the conduct of the affairs of the LEIJA-SANCHEZ ORGANIZATION through a pattern of racketeering activity, namely, through multiple acts indictable under the following federal provisions, and multiple acts involving murder chargeable under the following State laws, specifically:

- a. Title 18, United States Code, Section 1028 (unlawful production of identification documents, authentication features, or false identification documents);
- b. Title 18, United States Code, Section 1546 (fraud and misuse of visas, permits, and other documents);
- c. Acts involving murder in violation of state law, which are punishable by imprisonment for more than one year, that is, first degree murder, conspiracy to commit murder, attempted murder, and solicitation to commit murder, in violation of 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1.1, 5/8-2, 5/8-4, and 5/9-1;
- d. Title 8, United States Code, Section 1324(a)(1)(A) (alien smuggling for the purpose of financial gain);
- e. Title 18, United States Code, Sections 956, and 2 (conspiracy to kill, kidnap, maim or injure persons in a foreign country);
- f. Title 18, United States Code, Section 1956 (money laundering); and
- g. Title 18, United States Code, Section 1958 (use of interstate commerce facilities in the commission of murder-for-hire);

- 8. It was further part of the conspiracy that the defendants agreed that a conspirator

would commit at least two acts of racketeering activity in the conduct of the affairs of the LEIJA-SANCHEZ ORGANIZATION.

**MANNER AND MEANS OF THE CONSPIRACY**

9. It was further part of this conspiracy that the manner and means through which the defendants, and others employed by and associated with the LEIJA-SANCHEZ ORGANIZATION, conducted and participated in the conduct of the affairs of the LEIJA-SANCHEZ ORGANIZATION, and acted during and in furtherance of this conspiracy included, but were not limited to, the commission the following acts, schemes, and objectives, which were committed with the direction, participation, agreement, and knowledge of the defendants:

a. The LEIJA-SANCHEZ ORGANIZATION caused the unlawful production of identification documents, authentication features, and false identification documents (such as driver's licenses, immigration documents, and other purportedly government-issued documents) for sale to customers in the Little Village area of Chicago.

b. Members of the LEIJA-SANCHEZ ORGANIZATION solicited customers on street corners in the Little Village area of Chicago to purchase false identification documents in exchange for money. When a customer was located, members of the LEIJA-SANCHEZ ORGANIZATION directed the customer to obtain a photograph from Nuevo Foto Munoz, and to provide the photograph and personal information to place on the false identification document.

c. Members of the LEIJA-SANCHEZ ORGANIZATION caused the photographs and personal information from customers to be sent to a location where the false identification documents were made.

d. Members of the LEIJA-SANCHEZ ORGANIZATION manufactured the false identification documents at various locations, including an apartment located at 2555 South

Lombard Avenue, Cicero, Illinois, and a basement apartment located at 5366 South Campbell Avenue, basement unit, Chicago, Illinois.

e. Members of the LEIJA-SANCHEZ ORGANIZATION conducted counter-surveillance to detect the presence of law enforcement while they and coconspirators were committing illegal activities, and to warn other members of the LEIJA-SANCHEZ ORGANIZATION of the presence of law enforcement in the area.

f. Members of the LEIJA-SANCHEZ ORGANIZATION collected cash proceeds from the sale of false documents and smuggled and attempted to smuggle some of the cash in bulk to locations in Mexico.

g. Members of the LEIJA-SANCHEZ ORGANIZATION communicated with associates in Mexico in order to discuss the business of the LEIJA-SANCHEZ ORGANIZATION and to order supplies needed to manufacture false identification documents.

h. Members of the LEIJA-SANCHEZ ORGANIZATION used violence and threats of violence against competitors and former members of the LEIJA-SANCHEZ ORGANIZATION in order to limit competition and punish those who left the LEIJA-SANCHEZ ORGANIZATION.

i. Members of the LEIJA-SANCHEZ ORGANIZATION caused persons to be illegally smuggled into the United States from Mexico in order to work for the LEIJA-SANCHEZ ORGANIZATION.

j. Members of the LEIJA-SANCHEZ ORGANIZATION committed illegal acts including murder, attempted murder, conspiracy to murder, and solicitation of murder against individuals who posed a threat to the LEIJA-SANCHEZ ORGANIZATION or jeopardized its operations, including rival members and witnesses to the illegal activities of the LEIJA-SANCHEZ



ORGANIZATION.

k. Members of the LEIJA-SANCHEZ ORGANIZATION earned profits for the LEIJA-SANCHEZ ORGANIZATION's members and regularly financed its activities through funds obtained in the sale of fraudulent identification documents.

l. Members of the LEIJA-SANCHEZ ORGANIZATION hid, misrepresented, concealed, and caused to be misrepresented, concealed, and hidden, the objectives of acts done in furtherance of the conspiracy, and used coded language and other means to avoid detection and apprehension by law enforcement authorities.

**NOTICE OF SPECIAL FINDINGS & ENHANCED SENTENCING**  
**AS TO THE RACKETEERING CONSPIRACY**

10. On or about April 1, 2007, in the Northern District of Illinois, Eastern Division, Tlalneantla, State of Mexico, and elsewhere, the defendants, JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, GERARDO SALAZAR-RODRIGUEZ, and others, known and unknown to the Grand Jury, committed and caused to be committed, the murder of Guillermo Jimenez Flores, aka "Montes." By the conduct described in this paragraph, the defendants committed an act involving murder, in violation of 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, and 5/9-1, 5/9-1(b)(5), and 5/9-1(b)(11), and 730, Illinois Compiled Statutes, Sections 5/5-8-1(a)(1)(b), 5/5-8-1(a)(1)(c)(ii), and 5/5-8-1(a)(1)(d)(iii), in that they killed an individual, that is, Guillermo Jimenez Flores, without lawful justification and, in performing the acts which caused the death, they: (i) intended to kill that individual and/or another; (ii) intended to do great bodily harm to that individual and/or another; (iii) knew such acts would cause the death of that individual and/or another; and (iv) knew such acts created a strong probability of death and great bodily harm to that individual and/or another; and

a. the murder was accompanied by exceptionally brutal and heinous behavior indicative of wanton cruelty; and

b. at the time of the commission of the offense, they had attained the age of 18 or more, and: (i) they committed the murder pursuant to a contract, agreement or understanding by which they were to receive money and anything of value in return for committing the murder and procured another to commit the murder for money and anything of value; (ii) the defendants, while committing an offense punishable under Titles 8 or 18 of the United States Code, and/or while engaged in a conspiracy or solicitation to commit such offense, intentionally killed an individual and/or counseled, commanded, induced, procured, and/or caused the intentional killing of the murdered individual; and (iii) they committed the murder in a cold, calculated, and premeditated manner pursuant to a preconceived plan, scheme, or design to take a human life by unlawful means, and the conduct of the defendants created a reasonable expectation that the death of a human being would result therefrom; and

c. during the commission of the offense, GERARDO SALAZAR-RODRIGUEZ personally discharged a firearm that proximately caused: (i) great bodily harm to another person; (ii) permanent disability to another person; (iii) permanent disfigurement to another person; and (iv) death to another person.

11. With respect to defendants JULIO LEIJA-SANCHEZ and GERARDO SALAZAR-RODRIGUEZ, the allegations of Count 5 are hereby reincorporated into this count as a special sentencing factor.

12. With respect to defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and GERARDO SALAZAR-RODRIGUEZ, the allegations of Count 6 are hereby reincorporated into this count as a special sentencing factor.

13. With respect to defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and GERARDO SALAZAR-RODRIGUEZ, the allegations of Count 7 are hereby reincorporated into this count as a special sentencing factor.

All of the above in violation of Title 18, United States Code, Section 1962(d).

### **COUNT THREE**

#### **MURDER OF GUILLERMO JIMENEZ FLORES**

The SPECIAL AUGUST 2006-1 GRAND JURY further alleges:

1. At times relevant to this superseding indictment:

a. The LEIJA-SANCHEZ ORGANIZATION, as more fully described in Paragraphs One through Six of Count Two of this superseding indictment, which are re-alleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

b. The LEIJA-SANCHEZ ORGANIZATION, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is acts indictable under Title 8, United States Code, Section 1324, Title 18, United States Code, Sections 956, 1028, 1546, 1956, and 1958, and acts involving murder, in violation of 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-2, 5/8-4, 5/8-1.1, and 5/9-1.

2. On or about April 1, 2007, in the Northern District of Illinois, Eastern Division, Tlalnepantla, State of Mexico, and elsewhere, defendants,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
GERARDO SALAZAR-RODRIGUEZ,**

and others known and unknown to the Grand Jury, for the purpose of gaining entrance to, and for maintaining and increasing the defendant's position in, the LEIJA-SANCHEZ ORGANIZATION,

and for a promise or agreement to pay something of pecuniary value, did knowingly and intentionally commit murder, of an individual, that is, Guillermo Jimenez Flores, in violation of the laws of the State of Illinois ( 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, and 5/9-1).

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

## **COUNT FOUR**

### **CONSPIRACY TO MURDER GUILLERMO JIMENEZ FLORES**

The SPECIAL AUGUST 2006-1 GRAND JURY further alleges:

1. The Grand Jury re-alleges and incorporates by reference the allegations contained in Paragraph One of Count Three of this superseding indictment as though fully set forth herein.

2. Beginning at least as early as on or about February 12, 2007, and continuing to at least on or about April 1, 2007, in the Northern District of Illinois, Eastern Division, and Tlalnepantla, State of Mexico, and elsewhere, defendants,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
GERARDO SALAZAR-RODRIGUEZ,**

and others known and unknown to the Grand Jury, for the purpose of gaining entrance to, and for maintaining and increasing the defendant's position in, the LEIJA-SANCHEZ ORGANIZATION, and for a promise or agreement to pay something of pecuniary value, did knowingly and intentionally conspire to commit murder of an individual, that is, Guillermo Jimenez Flores, in violation of the laws of the State of Illinois ( 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-2, and 5/9-1).

All in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

**COUNT FIVE**

**MURDER FOR HIRE**

The SPECIAL AUGUST 2006-1 GRAND JURY further alleges:

Beginning at least as early as on or about February 12, 2007, and continuing to at least on or about April 1, 2007, in the Northern District of Illinois, Eastern Division, and Tlalnepantla, State of Mexico, and elsewhere, defendants,

**JULIO LEIJA-SANCHEZ, and  
GERARDO SALAZAR-RODRIGUEZ,**

and others known and unknown to the grand jury, conspired to use or cause another to use a facility in interstate or foreign commerce with intent that a murder be committed, that is, the murders of Guillermo Jimenez Flores and an individual whom the defendants referred to as “Bruno,” in violation of the laws of the State of Illinois ( 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1.1, 5/8-2, 5/8-4, and 5/9-1) as consideration for the receipt of, or as consideration for a promise or agreement to pay, something of pecuniary value.

All in violation of Title 18, United States Code, Sections 1958 and 2.

## **COUNT SIX**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

1. Beginning on or about at least February 21, 2007, and continuing to on or about at least April 24, 2007, at Chicago, in the Northern District of Illinois, and elsewhere,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
GERARDO SALAZAR-RODRIGUEZ**

defendant herein, knowingly and intentionally conspired with others known and unknown to the grand jury, to commit at any place outside the United States, namely Mexico, an act that would constitute murder if committed in the special maritime and territorial jurisdiction of the United States, and did commit an act within the jurisdiction of the United States to effect an object of that conspiracy;

2. It was part of the conspiracy that JULIO LEIJA-SANCHEZ, from locations in Chicago, planned with MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and GERARDO SALAZAR-RODRIGUEZ, who were in Mexico, to murder an individual they referred to as “Montes.”

### **Overt Acts**

3. In furtherance of the conspiracy and to effect the objects and purposes thereof, defendant committed and caused to be committed the following overt acts, among others, within the Northern District of Illinois and elsewhere:

a. On or about February 21, 2007, JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone and promised SALAZAR-RODRIGUEZ that JULIO LEIJA-SANCHEZ would have money for Salazar-Rodriguez once he murdered “Montes;”



b. On or about March 8, 2007, JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone and SALAZAR-RODRIGUEZ explained to JULIO LEIJA-SANCHEZ that he had a particular kind of bullet he intended to use to murder “Montes;”

c. On or about March 31, 2007, JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone and SALAZAR-RODRIGUEZ reported to JULIO LEIJA-SANCHEZ that MANUEL LEIJA-SANCHEZ and PEDRO LEIJA-SANCHEZ had told SALAZAR to murder “Montes;”

d. On or about March 31, 2007, JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone and JULIO LEIJA-SANCHEZ authorized SALAZAR-RODRIGUEZ to kill “Montes;”

e. On or about April 4, 2007, after JULIO LEIJA-SANCHEZ was told by SALAZAR-RODRIGUEZ over the telephone that “Montes” had been killed, LEIJA-SANCHEZ made arrangements with SALAZAR-RODRIGUEZ to pay SALAZAR-RODRIGUEZ for his services through SALAZAR-RODRIGUEZ’s brother;

All in violation of Title 18, United States Code, Section 956(a)(1) and 2.

## **COUNT SEVEN**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

1. Beginning on or about at least February 21, 2007, and continuing to on or about at least April 18, 2007, at Chicago, in the Northern District of Illinois, and elsewhere,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
GERARDO SALAZAR-RODRIGUEZ,**

defendants herein, knowingly and intentionally conspired with others known and unknown to the grand jury, to commit at any place outside the United States, namely Mexico, an act that would constitute murder if committed in the special maritime and territorial jurisdiction of the United States, and did commit an act within the jurisdiction of the United States to effect an object of that conspiracy;

2. It was part of the conspiracy that JULIO LEIJA-SANCHEZ, from locations in Chicago, planned with MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and GERARDO SALAZAR-RODRIGUEZ, who were in Mexico, to murder an individual they referred to as “Bruno.”

### **Overt Acts**

3. In furtherance of the conspiracy and to effect the objects and purposes thereof, defendant committed and caused to be committed the following overt acts, among others, within the Northern District of Illinois and elsewhere:

a. On or about April 3, 2007, at approximately 4:40 p.m., JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone about “Bruno” and told SALAZAR-RODRIGUEZ to “burn the fucking son of a bitch, man;”

b. On or about April 3, 2007, at approximately 6:16 p.m., JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone about “Bruno” and told SALAZAR-RODRIGUEZ to “take him to Nabor, so that he can cut him up in pieces;”

c. On or about April 5, 2007, JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone about “Bruno” and told SALAZAR-RODRIGUEZ to “do the same thing you did to Montes, dude, but shoot him two times, dude. And leave him disabled, dude, and then, pull him out and into the trunk, dude;”

d. On or about April 13, 2007, JULIO LEIJA-SANCHEZ spoke with MANUEL LEIJA-SANCHEZ over the telephone about “Bruno,” and MANUEL LEIJA-SANCHEZ said, “we went looking for him;”

e. On or about April 16, 2007, JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone about “Bruno,” and SALAZAR-RODRIGUEZ said MANUEL LEIJA-SANCHEZ “left me bullets.”

f. On or about April 18, 2007, JULIO LEIJA-SANCHEZ spoke with SALAZAR-RODRIGUEZ over the telephone about “Bruno,” and SALAZAR-RODRIGUEZ said PEDRO LEIJA-SANCHEZ had told SALAZAR-RODRIGUEZ to “do the deed” and bring his weapon.

All in violation of Title 18, United States Code, Section 956(a)(1) and 2.

**COUNT EIGHT**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

On or about February 23, 2007, at Chicago, in the Northern District of Illinois, and elsewhere,

**JULIO LEIJA-SANCHEZ,  
RAUL GONZALEZ-MARQUEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
ELIAS MARQUEZ,**

defendants herein, knowingly attempted to transport, transmit, and transfer funds, namely, approximately \$170,002, from a place in the United States, namely, Chicago, Illinois, to and through a place outside the United States, namely, Mexico, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of the specified unlawful activity and knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity;

In violation of Title 18, United States Code, Section 1956(a)(2)(B)(i) and 2.

**COUNT NINE**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

On or about May 25, 2007, at Chicago, in the Northern District of Illinois,

**JOSE CORTEZ-PEREZ,**

defendant herein, an alien who had been previously deported and removed from the United States on or about December 23, 1992, subsequent to a conviction for commission of an aggravated felony, was present and found in the United States without having previously obtained the express consent of the United States Attorney General and at any time after February 28, 2003, from the Secretary of the Department of Homeland Security for reapplication by the defendant for admission into the United States;

In violation of Title 8, United States Code, Section 1326(a) and (b)(2).

**COUNT TEN**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

1. Beginning at least as early as on or about February 25, 2007, and continuing to at least on or about March 30, 2007, in the Northern District of Illinois, Mexico, and elsewhere, defendants,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
ELIAS MARQUEZ,**

did conspire with others, known and unknown to the Grand Jury, for the purpose of private financial gain, to transport, move, and attempt to transport and move aliens within the United States by means of transportation or otherwise in furtherance of such violation, knowingly and in reckless disregard of the fact that the aliens they were transporting had come to, entered, and remained in the United States in violation of law, in violation of Title 8, United States Code, Sections 1324 (a)(1)(A)(ii) and 1324(a)(1)(B)(i).

2. It was part of the conspiracy that defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and ELIAS MARQUEZ recruited and caused other co-conspirators to recruit on their behalf individuals who were willing to pay a smuggling fee and work for the LEIJA-SANCHEZ ORGANIZATION in exchange for being transported illegally into the United States (these persons are hereinafter referred to as “alien clients”).

4. It was further part of the conspiracy defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and ELIAS MARQUEZ transported, and caused to be transported, the alien clients from Mexico to various locations in the United States, principally Chicago, Illinois.

3. It was further part of the conspiracy that, from time to time, defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and ELIAS MARQUEZ fronted smuggling fees to the actual smuggler on behalf of the alien clients. In these instances, the alien clients worked for the LEIJA-SANCHEZ ORGANIZATION to repay the smuggling fees to defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and ELIAS MARQUEZ .

4. It was further part of the conspiracy that, in some instances, defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ and ELIAS MARQUEZ wired the smuggling fee from Chicago, Illinois, to Mexico, under alias names.

5. It was further part of the conspiracy that, in some instances, in order to conceal the identities of the conspirators and alien clients while participating in acts in furtherance of the conspiracy, defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, and ELIAS MARQUEZ provided alien clients fraudulent identification documents in alias names.

6. It was further part of the conspiracy that defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, PEDRO LEIJA-SANCHEZ, ELIAS MARQUEZ , and others hid, concealed and caused to be hidden and concealed the acts and objects of the conspiracy;

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).

**COUNT ELEVEN**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

On or about February 26, 2007, at Chicago, Illinois, in the Northern District of Illinois,  
Galveston, Texas, and elsewhere,

**JULIO LEIJA-SANCHEZ,  
RAUL GONZALEZ-MARQUEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
ELIAS MARQUEZ,**

defendants herein, with the intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal and cause to be concealed more than \$10,000 in United States Currency, that is approximately \$170,000 in United States Currency, in a conveyance, container and on the person of another, and caused to be transported and transferred, and did attempt to transport and transfer, said United States Currency, from a place within the United States, that is Chicago, Illinois, to a place outside the United States, that is Mexico;

In violation of Title 31, United States Code, Section 5332, and Title 18, United States Code, Section 2.



## **FORFEITURE ALLEGATION ONE**

### **Relating to Fraudulent Document and Visa Fraud**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

1. The allegations of Count One of this superseding indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to the provisions of Title 18, United States Code, Section 982.

2. As a result of their violations of Title 18, United States Code, Section 371, as alleged in this superseding indictment,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ, and  
PEDRO LEIJA-SANCHEZ**

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 982(a)(6)(A): (1) any and all property constituting and derived from, any proceeds they obtained, directly and indirectly, as a result of the violations; and (2) any and all of property used, and intended to be used, in any manner or part, to commit and facilitate the commission of the violations.

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 982(a)(6)(A), and 1028(g), include, but are not limited to, the following:

a. \$5,000,000, including the \$170,002 seized in Galveston, Texas on or around February 26, 2007, the \$219,688 seized from 5445 West 64th Street, Chicago, Illinois from the apartment of ELIAS MARQUEZ on or around April 24, 2007, and the \$1,567 seized from 5466

South Campbell, Chicago, Illinois, on or around April 24, 2007;

b. the following items seized from 5445 West 64<sup>th</sup> Street, Chicago, Illinois, on or around April 24, 2007: (1) One HP Laptop, Serial Number NICNF7043W0ZC; (2) One Sony Laptop, Serial Number NIC3LNDMK5; (3) one Memorex Flash Drive; and (4) One Sandisk Compact Flash Drive; and

c. the following items seized from 5366 South Campbell, Chicago, Illinois, on or around April 24, 2007: (1) one Power Spec Computer, Serial Number 6650060600759; (2) one Compaq Persario Computer, Serial Number CNH5420RF9; (3) One Zebra Card Printer model P310C; (4) Two computer monitors; (5) Two Paper Cutters; (6) Two Computer Scanners; (7) Two Power Surge Protectors; and (8) two laminators.

4. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Sections 982(a)(2)(B), 982(a)(6)(A), and 1028(g), as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to defendants under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1);

5. The above-named defendants, and each of them, are jointly and severally liable for

the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 982.

## **FORFEITURE ALLEGATION TWO**

### **Relating to Money Laundering**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

1. The allegations of Count Eight of this superseding indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to the provisions of Title 18, United States Code, Section 982(a)(1).

2. As a result of their violations of Title 18, United States Code, Section 1956, as alleged in this superseding indictment,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ,  
PEDRO LEIJA-SANCHEZ, and  
RAUL GONZALEZ-MARQUEZ,**

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all right, title, and interest defendants have in any property that represents the subject of each transaction; all money and other property that is traceable to such property.

3. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 982 include: all money and other property that represents the subject of each transactions; all money and other property that is traceable thereto; and all money and property that facilitated the transactions, including but not limited to, the following:

a. \$5,000,000, including the \$170,002 seized in Galveston, Texas on or around February 26, 2007, the \$219,688 seized from 5445 West 64th Street, Chicago, Illinois from the apartment of ELIAS MARQUEZ on or around April 24, 2007, and the \$1,567 seized from 5466 South Campbell, Chicago, Illinois, on or around April 24, 2007;

b. the following items seized from 5445 West 64<sup>th</sup> Street, Chicago, Illinois, on or around April 24, 2007: (1) One HP Laptop, Serial Number NICNF7043W0ZC; (2) One Sony Laptop, Serial Number NIC3LNDMK5; (3) one Memorex Flash Drive; and (4) One Sandisk Compact Flash Drive; and

c. the following items seized from 5366 South Campbell, Chicago, Illinois, on or around April 24, 2007: (1) one Power Spec Computer, Serial Number 6650060600759; (2) one Compaq Persario Computer, Serial Number CNH5420RF9; (3) One Zebra Card Printer model P310C; (4) Two computer monitors; (5) Two Paper Cutters; (6) Two Computer Scanners; (7) Two Power Surge Protectors; and (8) two laminators.

4. If any of the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 982, and described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to defendants under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1);

5. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 982.

## **FORFEITURE ALLEGATION THREE**

### **Relating to Racketeering**

The SPECIAL AUGUST 2006-1 GRAND JURY further charges:

1. The allegations of Count Two of this superseding indictment are realleged and incorporated herein by reference for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to the provisions of Title 18, United States Code, Section 1963.

2. As a result of the conspiracy to violate Title 18, United States Code, Section 1962, as alleged in this superseding indictment,

**JULIO LEIJA-SANCHEZ,  
MANUEL LEIJA-SANCHEZ, and  
PEDRO LEIJA-SANCHEZ,**

defendants herein,

a. have acquired and maintained interests in violation of Title 18, United States Code, Section 1962(d), which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1); and

b. have an interest in, security of, claims against, and property and contractual rights which afford a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and

c. have property constituting and derived from proceeds which defendants

JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, and PEDRO LEIJA-SANCHEZ obtained directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962(d), which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

3. The interests of defendants JULIO LEIJA-SANCHEZ, MANUEL LEIJA-SANCHEZ, and PEDRO LEIJA-SANCHEZ subject to forfeiture to the United States pursuant to Title 18, United States Code, Sections 1963(a)(1), (a)(2), and (a)(3) include, but are not limited to, the following:

a. \$5,000,000, including the \$170,002 seized in Galveston, Texas on or around February 26, 2007, the \$219,688 seized from 5445 West 64th Street, Chicago, Illinois from the apartment of ELIAS MARQUEZ on or around April 24, 2007, and the \$1,567 seized from 5466 South Campbell, Chicago, Illinois, on or around April 24, 2007;

b. the following items seized from 5445 West 64<sup>th</sup> Street, Chicago, Illinois, on or around April 24, 2007: (1) One HP Laptop, Serial Number NICNF7043W0ZC; (2) One Sony Laptop, Serial Number NIC3LNDMK5; (3) one Memorex Flash Drive; and (4) One Sandisk Compact Flash Drive; and

c. the following items seized from 5366 South Campbell, Chicago, Illinois, on or around April 24, 2007: (1) one Power Spec Computer, Serial Number 6650060600759; (2) one Compaq Persario Computer, Serial Number CNH5420RF9; (3) One Zebra Card Printer model P310C; (4) Two computer monitors; (5) Two Paper Cutters; (6) Two Computer Scanners; (7) Two Power Surge Protectors; and (8) two laminators.

4. Pursuant to the provisions of Title 18, United States Code, Section 1963(m), if any of the property described above as being subject to forfeiture, as a result of any act or omission of



the defendants, either:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the court shall order the forfeiture of any other property of the defendants up to the value of the above forfeitable property.

5. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 1963.

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FOREPERSON

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UNITED STATES ATTORNEY